1401 Main Street. Suite 900

ORS

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Jeffrey M. Nelson Chief Legal Officer

January 23, 2019

VIA ELECTRONIC FILING

Jocelyn G. Boyd, Esquire Chief Clerk & Administrator Public Service Commission of South Carolina 101 Executive Center Drive, Suite 100 Columbia, South Carolina 29210

RE: Petition of Carolina Water Service, Incorporated for an Accounting Order

to Defer and Record as a Regulatory Asset Certain Operations and Maintenance Expenses Caused by Hurricanes with Verification

Docket No. 2019-17-WS

Dear Ms. Boyd:

By this letter, the South Carolina Office of Regulatory Staff ("ORS") hereby notifies the Public Service Commission of South Carolina ("Commission") that ORS has reviewed and does not oppose the Petition of Carolina Water Service, Inc. ("CWS" or "the Company") requesting approval for an accounting order to amortize extraordinary operation and maintenance expense pursuant to S.C. Code §§58-3-140, 58-5-210 and S.C. Code Reg. 103-830.

The Company requests an accounting order for regulatory and financial accounting purposes authorizing the Company to defer in a regulatory asset extraordinary operations and maintenance costs totaling \$208,713.59 that have been incurred by the Company related to Hurricane Florence and Hurricane Michael.

The Company further seeks permission to begin amortizing the expenses over a five (5) year period. This results in an annual amortization expense of \$41,742.72.

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The Company's request will not involve a change to any retail rates or prices at this time or require any change in any Commission rule, regulation, or policy. ORS's position is predicated on the basis that the issuance of an accounting order in this matter will not preclude the ORS, Commission, or any other party, from addressing the reasonableness of these costs, including the remaining unamortized balance in a subsequent general rate case or other proceeding.

If you have any questions, please do not hesitate to contact me.

Sincerely,

cc: Joseph Melchers, Esquire (via E-mail)